

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION

**RAUL NOVOA, JAIME CAMPOS  
FUENTES, ABDIAZIZ KARIM, and  
RAMON MANCIA**, individually and  
on behalf of all others similarly situated,

*Plaintiffs,*

v.

**THE GEO GROUP, INC.,**

*Defendant.*

Civil Action No. 5:17-cv-02514-JGB-SHKx

**DECLARATION OF LYDIA  
WRIGHT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
CLASS CERTIFICATION**

I, Lydia Wright, declare that the following is true and correct based upon my personal knowledge:

1. I am an attorney for the Plaintiffs in the above-captioned action.
2. Attached hereto are the following exhibits in support of Plaintiffs' Motion for Class Certification, ECF 192:
3. Attached as **Exhibit 1** is a true and correct copy of *Nwauzor v. The GEO Group, Inc.*, No. 17-cv-5769 (W.D. Wash. Aug. 6, 2018) (certifying a class of immigrants detained at GEO's Tacoma ICE Processing Center alleging GEO violated the Washington Minimum Wage Act by paying detained immigrant workers participating in the Work Program only \$1 per day), *petition for permission to appeal denied*, No. 18-80095 (9th Cir. Nov. 8, 2018) ("*Nwauzor* Orders").
4. Attached as **Exhibit 2** is a true and correct copy of the Intergovernmental Services Agreement ("IGSA") between the City of Adelanto and United States

1 Immigration and Customs Enforcement (“ICE”) for the detention and care of civil  
2 immigration detainees awaiting removal proceedings.

3 5. Attached as **Exhibit 3** is a true and correct copy of the Services Contract  
4 between the City of Adelanto and GEO, wherein GEO assumed responsibility for the  
5 management and operation of the Adelanto Facility.

6 6. Attached as **Exhibit 4** is a true and correct copy of the transcript of the  
7 deposition of James Janecka, GEO’s Warden/Facility Administrator of the Adelanto  
8 ICE Processing Center, taken in this matter on June 26, 2019 in Los Angeles, California.

9 7. Attached as **Exhibit 5** is a true and correct copy of the transcript of the  
10 deposition of Daniel Ragsdale, GEO’s Executive Vice President of Contract  
11 Compliance, taken in this matter on June 12, 2019 in Fort Lauderdale, Florida.

12 8. Attached as **Exhibit 6** is a true and correct copy of an email chain between  
13 Warden Janecka and others, dated July 1, 2015, with the following subject line: “West  
14 Sanitation.”

15 9. Attached as **Exhibit 7** is a true and correct copy of an email chain between  
16 Warden Janecka and others, dated April 4, 2017, with the following subject line: “East  
17 Sanitation.”

18 10. Attached as **Exhibit 8** is a true and correct copy of an email chain between  
19 Warden Janecka and others, dated July 13, 2017, with the following subject line: “West  
20 Notes.”

21 11. Attached as **Exhibit 9** is a true and correct copy of an email chain between  
22 Matthew Holm, GEO’s former Warden/Facility Administrator of the Adelanto ICE  
23 Processing Center, and others, dated September 15, 2012, with the following subject  
24 line: “ODO Audit.”

25 12. Attached as **Exhibit 10** is a true and correct copy of an email chain between  
26 Warden Janecka and others, dated September 26, 2016, with the following subject line:  
27 “Day One ACA Mock Walk.”  
28

1           13. Attached as **Exhibit 11** is a true and correct copy of an email chain between  
2 Patricia Love, GEO's Assistant Warden for Security at the Adelanto ICE Processing  
3 Center, and others, dated March 7, 2018, with the following subject line: "Kitchen staff  
4 and the their [sic] lunches."

5           14. Attached as **Exhibit 12** is a true and correct copy of an email between  
6 Michelle Keeney, Food Service Production Supervisor at the Adelanto ICE Processing  
7 Center, and others, dated March 30, 2018, with the following subject line: "Detainee  
8 Payroll."

9           15. Attached as **Exhibit 13** is a true and correct copy of the Adelanto ICE  
10 Processing Center's "Monthly Food Service Dept. Meeting Minutes," dated July 26,  
11 2018.

12           16. Attached as **Exhibit 14** is a true and correct copy of Section 5.8 of ICE's  
13 2011 Performance Based National Detention Standards (rev'd 2016).

14           17. Attached as **Exhibit 15** is a true and correct copy of Policy 8.1.8 of GEO's  
15 Adelanto ICE Processing Center Policy and Procedure Manual, entitled Detainee Work  
16 Program: Detainee Work Plan.

17           18. Attached as **Exhibit 16** is a true and correct copy of GEO's Adelanto ICE  
18 Processing Center Supplemental Detainee Handbook.

19           19. Attached as **Exhibit 17** is a true and correct copy of an email chain between  
20 Joanne Langill, GEO's Compliance Administrator at the Adelanto ICE Processing  
21 Center, and others, dated September 4, 2018, with the following subject line: "Detainee  
22 applications," along with an attachment entitled "Detainee Work Detail Application."

23           20. Attached as **Exhibit 18** is a true and correct copy of a document entitled  
24 "House Keeping Plan."

25           21. Attached as **Exhibit 19** is a true and correct copy of the transcript of the  
26 deposition of David J. Venturella, GEO's Senior Vice President of Client Relations,  
27 taken in this matter on June 13, 2019 in Fort Lauderdale, Florida.

1           22. Attached as **Exhibit 20** is a true and correct copy of an email chain  
2 between Brandi Combest, GEO's Bookkeeper at the Adelanto ICE Processing Center,  
3 and others, dated December 29, 2013.

4           23. Attached as **Exhibit 21** is a true and correct copy of an email chain between  
5 Angelica Hernandez, GEO's Classification Officer at the Adelanto ICE Processing  
6 Center, and others, dated November 6, 2012, with the following subject line: "Detainee  
7 Workers."

8           24. Attached as **Exhibit 22** are a true and correct copies of documents entitled  
9 "Detainee Payroll, Adelanto ICE Processing Center," dated January 21, 2018, January 1,  
10 2018, and November 12, 2017.

11           25. Attached as **Exhibit 23** is a true and correct copy of Policy 12.1.4 of  
12 GEO's Adelanto ICE Processing Center Policy and Procedure Manual, entitled  
13 "Sanitation: Sanitation Procedures/Housekeeping Plan."

14           26. Attached as **Exhibit 24** is a true and correct copy of Policy 10.3.5 of  
15 GEO's Adelanto ICE Processing Center Policy and Procedure Manual, entitled "Post  
16 Orders: Housing Unit Office."

17           27. Attached as **Exhibit 25** is a true and correct copy of excerpts from GEO's  
18 Northwest Detention Center Detainee Handbook.

19           28. Attached as **Exhibit 26** is a true and correct copy of a February 14, 2018  
20 letter from David Venturella to then-Acting Director of ICE Thomas D. Homan, with  
21 the following subject line: "Request for Equitable Adjustment in the Amount of  
22 \$2,057,000 and Legal Assistance from ICE/DOJ."

23           29. Attached as **Exhibit 27** is a true and correct copy of the report issued on  
24 September 27, 2018 by the Office of Inspector General, Dept. of Homeland Security  
25 entitled "Management Alert—Issues Requiring Action at the Adelanto ICE Processing  
26 Center in Adelanto, California" ("OIG-18-86").  
27  
28

1           30. Attached as **Exhibit 28** is a true and correct copy of the report issued on  
2 June 3, 2019 by the Office of Inspector General, Dept. of Homeland Security,  
3 “Concerns about ICE Detainee Treatment and Care at Four Detention Facilities”  
4 (“OIG-19-47”).

5           31. Attached as **Exhibit 29** is a true and correct copy of the report issued on  
6 June 26, 2018 by the Office of Inspector General, Dept. of Homeland Security, “ICE’s  
7 Inspections and Monitoring of Detention Facilities Do Not Lead to Sustained  
8 Compliance or Systemic Improvements” (“OIG-18-67”).

9           32. Attached as **Exhibit 30** is a true and correct copy of the report issued on  
10 January 29, 2019 by the Office of Inspector General, Dept. of Homeland Security, “ICE  
11 Does Not Fully Use Contracting Tools to Hold Detention Facility Contractors  
12 Accountable for Failing to Meet Performance Standards” (“OIG-19-18”).

13           33. Attached as **Exhibit 31** is a true and correct copy of the Declaration of  
14 David J. Venturella, dated December 22, 2015 and filed as ECF No. 92 in *Detention Watch*  
15 *Network, et al. v. United States Immigration and Customs Enforcement, et al.*, Case No. 1:14-cv-  
16 00583-LGS (S.D.NY).

17           34. Attached as **Exhibit 32** is a true and correct copy of a chart created by  
18 undersigned counsel entitled “Summary of Proposed Classes and Subclasses.”

19           35. Attached as **Exhibit 33** is a true and correct copy of Amendments of  
20 Solicitation/Modification of Contract No. P00002 (dated November 5, 2012) and  
21 P00009 (dated October 14, 2015).

22           36. Attached as **Exhibit 34** is a true and correct copy of Plaintiffs’ Second Set  
23 of Requests for Admission and Request for Inspection to Defendant the GEO Group,  
24 Inc., which were served on GEO on August 23, 2019. GEO did not respond or object  
25 to the Requests for Admission within 30 days after being served. Accordingly, the  
26 Requests for Admission are deemed admitted pursuant to Fed. R. Civ. P 36(a)(3).  
27  
28

1           37. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the  
2           foregoing is true and correct to the best of my knowledge.  
3

4           Dated:           September 27, 2019

/s/ Lydia A. Wright

Lydia A. Wright (admitted *pro hac vice*)

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**CERTIFICATE OF SERVICE**

On September 27, 2019, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Central District of California, using the electronic case filing system. I hereby certify that I have provided copies to all counsel of record electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Lydia Wright

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